IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MICHAEL ABNER, et al.,

Plaintiffs,

No. 2:24-cv-01129

v.

ELECTRONICALLY FILED DOCUMENT

FEDEX GROUND PACKAGE SYSTEM, INC. and FEDEX CORPORATION

Defendants.

DECLARATION OF JEREMY ABAY IN SUPPORT OF PRO HAC VICE MOTION

- I, Jeremy Abay, in support of my motion for pro hac vice admission, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:
 - 1. I am an attorney at the law firm of Lichten & Liss-Riordan, P.C..
 - 2. My office is located at 76 E. Euclid Avenue, Haddonfield, New Jersey 08033.
 - 3. I am a member in good standing of the following courts:
 - a. Pennsylvania (M.D.) 03/08/2019
 - b. Pennsylvania (E.D.) 11/04/2014
 - c. New Jersey (District) (No. 083862013) 12/27/2013
 - d. Third Circuit Court of Appeals 10/15/2020
 - e. U.S. Supreme Court 05/05/2021
 - f. New York (State) 08/01/2019
 - g. New Jersey (State) 12/09/2013
 - h. Pennsylvania (State) (No. 316730) 10/23/2013
- 4. My partner, Sarah Schalman-Bergen, is attorney of record for Plaintiffs and is admitted to practice in the United States District Court for the Western District of Pennsylvania.

- 5. I have never been the subject of any disciplinary action in any jurisdiction and have never been denied admission to any court.
- 6. I have registered under the ECF/CM system in the United States District Court for the Western District of Pennsylvania.
- 7. I have read and familiarized myself with the Local Rules for the United States
 District Court for the Western District of Pennsylvania.
- 8. Based on the foregoing, I respectfully request that I be granted pro hac vice admission in this matter.

Dated: August 14, 2024 Respectfully submitted,

/s/ Jeremy Abay

Jeremy Abay (PA Bar No. 316730) LICHTEN & LISS-RIORDAN, P.C. 76 E. Euclid Avenue, Suite 101 Haddonfield, New Jersey 08035 (856) 509-5346 jabay@llrlaw.com

Attorneys for Plaintiffs